

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

MARYLAND SHALL ISSUE, INC., *et al.*, \*

*Plaintiffs*, \*  
v. \* Civil Case No. 16-cv-3311-MJG  
*LAWRENCE HOGAN, et al.*, \*  
*Defendants*. \*

\* \* \* \* \*

**CONSENT MOTION TO EXTEND TIME  
TO FILE SUMMARY JUDGMENT MOTIONS**

Defendants, Governor Lawrence J. Hogan and Superintendent of Maryland State Police William M. Pallozzi, sued in their official capacity (“Defendants”), by their attorneys and with the consent of plaintiffs, hereby move for an order extending the deadlines to file summary judgment motions and state as follows:

1. On September 25, 2017, this Court entered a Scheduling Order in this case. (Doc. No. 36)
2. On March 22, 2018, Defendants filed a consent motion to amend the scheduling order to extend the deadlines for the completion of discovery and other pre-trial matters by two weeks, which the Court granted. (Doc. No. 52)
3. Pursuant to the Amended Scheduling Order, summary judgment motions are due July 27, 2018. (Doc. No. 52).
4. Both Defendants and plaintiffs intend to file motions for summary judgment.

5. Pursuant to Local Rule 105.2(c), counsel have conferred and agreed that Defendants will file their motion for summary judgment first.

6. Due to the obligations of Defendants' counsel in other cases, as well as pre-planned vacations, counsel have agreed to the following briefing schedule:

Defendants' Summary Judgment Motion: August 17, 2018

Plaintiffs' Opposition/Cross-motion: September 21, 2018

Defendants' Opposition/Reply October 19, 2018

Plaintiffs' Reply November 5, 2018

WHEREFORE, Defendants respectfully request that the Court enter the attached proposed order setting deadlines for briefing the parties' motions for summary judgment.

Respectfully submitted,

BRIAN E. FROSH  
Attorney General of Maryland

*/s/ Robert A. Scott*

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JENNIFER L. KATZ (Fed. Bar No. 28973)  
ROBERT A. SCOTT (Fed. Bar. No. 24613)  
Assistant Attorneys General  
200 Saint Paul Place, 20th Floor  
Baltimore, Maryland 21202  
rscott@oag.state.md.us  
(410) 576-7055  
(410) 576-6955 (facsimile)

June 26, 2018

Attorneys for Defendants

**CERTIFICATE OF SERVICE**

I hereby certify that on the 26<sup>th</sup> day of June, 2018, a copy of the foregoing Consent Motion was filed via ECF and thereby served on all counsel of record.

*/s/ Robert A. Scott*

Robert A. Scott